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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

PONDEROSA RESOURCES CORPORATION,)	
)	
Petitioner,)	
)	
v.)	Civil Case No. 1:24-cv-00141-SWS
)	
THE UNITED STATES BUREAU OF LAND MANAGEMENT, ANDREW ARCHULETA, in)	
his official capacity as Wyoming State Director)	
for the U.S. Bureau of Land Management,)	
and THE UNITED STATES DEPARTMENT)	
OF THE INTERIOR,)	
)	
Respondents.)	
)	

**JOINT MOTION TO EXTEND THE DEADLINES FOR
ADMINISTRATIVE RECORD MOTIONS AND OPENING BRIEF**

Petitioner and Respondents jointly move to extend by 30 days the deadline for Petitioner

to file motions to complete the administrative record or for consideration of extra-record evidence, as well as the deadline for Petitioner's opening brief in the absence of such a motion. In support of this request, the Parties state as follows:

1. Respondents lodged the administrative records for this case on December 5, 2024. Dkt. 26.
2. Petitioner identified additional documents and information that it believes should be included in one or more of the administrative records and requested that Respondents complete the administrative records with those materials.
3. To allow the Parties additional time to confer about the contents of the administrative records and resolve potential disputes, the Court granted an extension of the deadline for Petitioner to file motions to complete the administrative record or for consideration of extra-record evidence, as well as the deadline for Petitioner's opening brief in the absence of such a motion. Dkt. 28.
4. Counsel for Petitioner and Counsel for Respondents further conferred and reached agreement about several of Petitioner's requested documents, while they continued to discuss others. To allow Respondents to complete the search for records from the 2001 rulemaking process, the Court granted an additional extension of the deadline for Petitioner to file motions to complete the administrative records or for consideration of extra-record evidence, as well as the deadline for Petitioner's opening brief in the absence of such a motion. Dkt. 30.
5. Respondents subsequently completed further searches, successfully retrieved the 2001 rulemaking record from archived BLM materials, and provided a number of additional

documents to Petitioner. The parties are engaged in continued discussion in an effort to avoid motions practice regarding the completeness of the administrative records.

6. Petitioner's current deadline to file motions to complete the administrative records or for consideration of extra-record evidence is May 1, 2025. Dkt. 30. In the absence of such a motion, Petitioner's current deadline to file its opening brief is June 2, 2025. *Id.*
7. The parties require additional time to complete those discussions and attempt to reach agreement regarding the completeness of the records to be lodged by Respondents.

For the foregoing reasons, the Parties respectfully request that the Court extend Petitioner's deadline to file motions to complete the administrative records or for consideration of extra-record evidence by 30 days, to June 2, 2025, and similarly extend the deadline for Petitioner's opening brief in the absence of administrative record motions to July 2, 2025.

Respectfully submitted this 30th day of April, 2025.

WELBORN SULLIVAN MECK & TOOLEY, P.C.

/s/ Danielle DiMauro

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